

C. REMARKS**Claim Rejections – 35 U.S.C. § 102(e)**

Claims 1-3, 6, 8-12, 15, 17-19, and 21 stand rejected under 35 U.S.C. §102(e) as being anticipated by Fuh et al., U.S. Patent No. 6,463,474. Rejection of these claims is respectfully traversed.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed Cir. 1987). Furthermore the reference must be an enabling disclosure of each and every element as set forth in the claim. *In re Hoecksma*, 158 USPQ 596, 600 (CCPA 1968); *In re LeGrive*, 133 USPQ 365, 372 (CCPA 1962). Because the Examiner does not show that Fuh teaches each and every element of claims 1-3, 6, 8-12, 15, 17-19, and 21, or enables each and every element of these claims, these claims are not anticipated. The rejection should be withdrawn, and the claims should be allowed.

Concerning Examiner’s rejection of claims 1, 10, and 18, Applicants respectfully submit that Fuh does not anticipate the invention of Applicants’ claims 1, 10, and 18 because Fuh does not teach expressly or inherently the elements of these claims, or enable the elements of these claims. Specifically, Fuh does not teach or enable the following elements of claim 1, and the corresponding elements of claims 10 and 18:

“detecting a timeout condition in the browser session” and

“displaying a second predetermined web page at the client device.”

Fuh does not teach “detecting a timeout condition in the browser session”

The Examiner argues that “Fuh describes how the authentication web page is displayed after timeout occurs within the browser/authentication session.” (Office Action, page 2.) Applicants respectfully disagree and submit that this characterization is not consistent with the teaching of Fuh. Fuh teaches “authentication” as being “activated or enabled at the firewall router 210. Authentication Proxy 400 may be implemented as a software process within firewall router 210” (Col. 10, lines 7-10). Also, Fuh teaches “a method of controlling access of a client to a network resource using a network device that is logically interposed between the client and the network resource” (Col. 3, lines 1-4), that “a firewall router 210 is logically interposed between LAN 206 and intranet 216” (Col. 8, lines 16-18), and that “one of the network devices 208a-208c of LAN 206 is a client 306” (Col. 8, lines 50-51). Thus, the firewall router and the client are separate and distinct, and the authentication process is running within the firewall router and not at the client’s device.

Fuh also teaches that “each authentication cache may have an inactivity timer...an inactivity cache is a software process that is maintained for each authentication cache based on the amount of traffic coming through firewall router 210 from Client 306” (Col. 14, lines 34-38). Thus, the authentication timer is running in the firewall router, and not in the client’s browser. In Fuh the detection of a timeout condition is based on the amount of traffic coming through the router, and it is not based on inactivity in a browser session. Furthermore, Fuh teaches that a browser is separate from the router stating, “client 306 runs a browser 304” (Col. 8, lines 57-64), and “a Browser 304 is executed by a client 306” (Col. 9, lines 7-8.) Therefore, it is respectfully submitted that Fuh does not teach or enable “detecting a timeout condition in the browser session” as claimed by Applicants. Therefore, Applicants respectfully submit that claims 1, 10 and 18 are not anticipated under 35 USC 102(b) by Fuh, and the rejection should be withdrawn.

Fuh does not teach “displaying a second predetermined web page

at the client device”

The Examiner argues that Fuh discloses the claimed element of “displaying a second predetermined web page at the client device” in column 15, lines 53-56. Applicants respectfully disagree. Fuh teaches that “if Client 306 does not initiate any network traffic through the firewall router 210...Authentication Proxy 400 will prompt User 302 to renew authentication for a new HTTP connection” (Col. 14, lines 50-56). However, displaying a renewal prompt is not the same as displaying a predetermined web page at the device. A renewal prompt is a program generated element that is typically a pop up window, dialog box or web form. Thus, to renew the authentication, the firewall router determines the content that is presented for the authentication request (i.e., a prompt to the User to renew the authentication), and does not “display[ing] a second predetermined web page...”

In contrast, Applicants’ claimed invention provides for “displaying a second predetermined web page at the client device” with “the ultimate result of maintaining privacy for the user is achieved in that once a timeout condition is reached, the content displayed at the browser is a page that is pre-defined by the user” (present application paragraph [0034]). Thus, Fuh does not teach predetermining or specifying a second web page to display when a browser session times out. Therefore, Applicants respectfully request that Applicants’ claim is not anticipated, and the rejection of claims 1, 10 and 18 should be withdrawn.

Concerning the Examiner’s rejection of claim 9, Applicants respectfully submit first that claim 9 is allowable because it is incorporates the limitations of claim 1 which, for the reasons set forth above, is patentable over Fuh. Furthermore, Fuh does not anticipate the invention of Applicants’ claims 9 because Fuh does not teach expressly or inherently the elements of claim 9, nor does Fuh enable the elements of claims 9. Specifically, Fuh does not teach or suggest:

“monitoring activity in the one or more browser sessions;”

“detecting a timeout condition in one or more browser sessions;” and
“displaying a second predetermined web page at the client device, in response to
the timeout condition”

Fuh does not teach “monitoring activity in the one or more browser sessions”

Fuh is directed to monitoring firewall router activity and not browser session activity as discussed above. In contrast, Applicants’ claimed monitoring activity is in one or more browser sessions which could be routed through a firewall but are not the same as firewall router access. Monitoring activity through a firewall router is not the same as monitoring a browser session. In particular, traffic through a firewall router can include network access other than browser sessions (e.g. file transfer protocol access.) Similarly, Fuh does not teach any method to individually monitor multiple browser sessions. The filtering of undesirable web site destinations is a monitoring of particular TCP/IP address destinations and not browser sessions as presently claimed. Therefore, Applicants submit that this element is not either expressly or inherently taught by Fuh, and Applicants’ claim is not anticipated by Fuh.

Fuh does not teach “detecting a timeout condition in one or more browser sessions”

As discussed above with respect to claim 1, Fuh sets an inactivity timer for router traffic and not based on a browser session. There is no teaching of monitoring one browser session nor of monitoring multiple distinct browser sessions. Thus, the teaching of Fuh does not teach or enable “detecting a timeout condition in one more browser sessions” as claimed by Applicants. Therefore, Applicants respectfully request that since Fuh does not teach or enable this element, then Applicants’ claim is not anticipated, and the rejection should be withdrawn, and method claim 9 should be allowed.

Fuh does not teach “displaying a second predetermined web page at the client device, in response to the timeout condition”

As discussed above with respect to Claim 1, Fuh neither teaches nor suggest displaying a predetermined web page at the client device. Therefore, Applicants respectfully submit that claim 9 is not anticipated, and respectfully request that the rejection of claim 9 be withdrawn.

Fuh does not teach “clearing the cache memory file associated with the browser session detected as having the timeout condition”

Examiner's rejection of claims 2, 11, and 19 is respectfully traversed. Claims 2, 11 and 19 depend upon independent claims 1, 10 and 18 respectively and as such incorporate the limitations of those claims. These independent claims are respectfully submitted to be patentable over Fuh as set forth above. Applicants further submit that Fuh does not anticipate Applicants invention because Fuh does not teach expressly or inherently “clearing the cache memory file associated with the browser session detected as having the timeout condition.” The Fuh does not teach Applicants claimed invention “wherein the client device includes a local cache memory file” since the cache taught by Fuh is in the firewall router and not local in the client. Furthermore, Fuh does not teach “clearing the cache memory file associated with the browser session detected as having the timeout condition” since the clearing of the cache taught by Fuh is at the firewall server and not at the client as claimed by Applicants, and the cache cleared by Fuh is the authentication cache and not “the cache memory file associated with the browser session detected as having the timeout condition” as claimed by Applicants.

Therefore, Applicants respectfully submit that claims 2, 11 and 19 are not anticipated by Fuh and respectfully request that the rejection of these claims be withdrawn.

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With respect to Examiner's rejection of claims 3 and 12, Applicants respectfully submit that these claims are dependent upon claims 1 and 10 respectively and, as such, incorporate the limitations of those claims. It is respectfully submitted that these claims are patentable over Fuh for the reasons set forth above. Withdrawal of the rejection of claims 3 and 12 is respectfully requested.

Fuh does not teach "monitoring activity in the one or more browser sessions"

With respect to Examiner's rejection of claims 6, 15, and 21, Applicants respectfully submit that Fuh does not teach or suggest monitoring multiple browsers sessions as set forth above. In particular, Fuh monitors network access through the firewall router and not individual browser sessions. Since network access is not synonymous with a browser session, the teachings of Fuh do not apply to the present invention. The filtering of undesirable web sites relates to network address monitoring and not browser session monitoring and does not anticipate the Applicants claimed invention. Furthermore, claims 6, 15 and 21 are dependent upon independent claims 1, 10 and 18 respectively and are patentable over Fuh for the reasons set forth above.

Therefore, Applicants respectfully submit that claims 6, 15, and 21 are patentable over Fuh and respectfully request that the rejection of these claims be withdrawn.

Fuh does not teach "the period of time is measured from a point of inactivity in the browser session"

With respect to Concerning Examiner's rejection of claims 8 and 17, Applicants respectfully submit these claims are dependent on allowable independent claims and are therefore in condition for allowance. The Examiner argues that Fuh discloses the limitations of claims 8 and 17 when it states "creating and storing an inactivity timer for the authorization information, wherin the inactivity timer expires when no

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communications are directed from the client to the network resource through the network device" (Col. 5, lines 10-20). However, Fuh teaches that the trigger for the timer to expire occurs when no communications are directed from the client to the network through the firewall router for a pre-determined period of time, which is different than the expiration of a timer is measured from "a point of inactivity in the browser session" as claimed by Applicants.

Therefore, Applicants respectfully submit that Fuh does not teach or suggest "the period of time is measured from a point of inactivity in the browser session," and that claims 8 and 17 are therefore patentable over Fuh for this reason in addition to the reasons set forth with respect to the independent claims. Withdrawal of the rejection of these claims is respectfully requested.

Claim Rejections – 35 U.S.C. § 103

Claims 5, 14, and 20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Fuh. Applicants respectfully traverse this rejection. Applicants respectfully submit that Fuh, alone or in combination with a conventional browser as proposed by Examiner's Office Notice, does not teach or suggest all the elements of claims 5, 14, and 20.

To establish a prima facie case of obviousness, three basic criteria must be met.¹ First, the combination must teach or suggest all of Applicants' claim limitations.² Second, there must be a suggestion or motivation to combine the references.³ Finally, there must be a reasonable expectation of success in the combination.⁴

¹ Manual of Patent Examining Procedure §2142.

² *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974).

³ *In re Vaeck*, 947 F.2d 488, 493, 20 USPQ2d 1438, 1442 (Fed. Cir. 1991).

⁴ *In re Merck & Co., Inc.*, 800 F.2d 1091, 1097, 231 USPQ 375, 379 (Fed. Cir. 1986).

The Examiner admitted that "Fuh does not explicitly state that there are multiple browser sessions currently active on the client device, monitoring more than one browser session, and responsive to a timeout condition at any one of the browser sessions, displaying the second web page at each of the browser sessions having a timeout condition." However, even accepting Examiner's Official Notice, Applicants submit that the combination does not teach or suggest all the elements of claims 5, 14, and 20.

Fuh and a Conventional Browser

The Examiner argues that a conventional browser supports multiple sessions. Assuming *arguendo* that this is true, this does not cure the lack of individual session monitoring in Fuh. Fuh is directed to monitoring network traffic through a firewall. As discussed above, this network traffic can include traffic generated with no browser or with multiple browsers. If a Fuh browser has multiple browser sessions, Fuh still teaches monitoring the combined traffic and provides no teaching for monitoring separate browser sessions. The combination of Fuh and a conventional browser as described in Examiner's Official Notice cannot establish a *prima facie* case of obviousness because the proposed combination does not teach or suggest each and every element of claims 5, 14, and 20, the combination teaches away from the claimed invention, there is no suggestion or motivation to make the proposed combination, there is no reasonable expectation of success in the proposed combination,

The Combination Fuh and a Conventional Browser

Does Not Teach or Suggest all Of Applicants' Claim Limitations

The combination of Fuh and a conventional browser as described in Examiner's Official Notice does not teach or suggest all of Applicants' claim limitations, in particular, the combination does not teach or suggest "monitoring the more than one browser sessions

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and responsive to a timeout condition at any one of the browser sessions, displaying the second web page at each of said browser sessions having a timeout condition."

Fuh teaches that "the HTTP packets are intercepted by a firewall... and can prevent users of clients... from accessing undesirable web sites" (Col. 7, lines 41-45). Also, Fuh teaches a browser 304 running at a client 306 as separate and distinct from the firewall router 210 (FIG. 3). Thus, according to teaching of Fuh, the intercepting of HTTP packets to prevent users of clients from accessing undesirable web sites is accomplished at the firewall router and not at a client device as claimed by Applicants. Furthermore, Fuh teaches "intercepting the HTTP packets by a firewall" (Col. 7, lines 41-47) and does not teach monitoring browser sessions. It is very well known in the art that a browser session can access other than HTTP packets, for example Java applets, JavaScript commands text, graphics and audio files, etc., within a browser session. Thus, if the teaching by Fuh is combined with a conventional browser as proposed by the Examiner, the combination still does not teach or suggest Applicants' claimed invention, because the proposed combination would yield a firewall router that although capable of running multiple browser sessions, it would still be a firewall router intercepting HTTP packets and is still would not be monitoring the more than one browser sessions as claimed by Applicants.

Also, the combination of Fuh and a conventional browser does not teach "responsive to a timeout condition at any one of the browser sessions, displaying the second web page at each of said browser sessions having a timeout condition" because Fuh teaches that "each authentication cache may have an inactivity timer...an inactivity cache is a software process that is maintained for each authentication cache based on the amount of traffic coming through firewall router 210 from Client 306" (Col. 14, lines 34-38). Thus, the authentication timer is running at the firewall router, and not at the client's browser. Even if Fuh is combined with a conventional browser, the detection of the timeout condition would still be based on the amount of traffic coming through the router, and it would not

be based on monitoring activity that causes detecting a timeout condition in one or more browser sessions as claimed by Applicants.

Contrary to Examiners assertion that “each session reverts to the Authentication page responsive to a timeout condition,” Fuh is not teaching browser sessions but router communications traffic. Applicants submit that the proposed combination still does not teach “displaying the second web page at each of said browser sessions having a timeout condition” because the proposed “authentication page” as taught by Fuh would prompt the user to renew authentication for an HTTP connection, and is does not present “a second predetermined page” that is predefined by the user (present application paragraph [0034]) as claimed by Applicants.

Therefore, neither Fuh alone or in combination with a conventional browser as proposed by Examiner’s Official Notice, teach or suggest Applicants’ claimed invention and allowance of Claim 5, and corresponding claims 14 and 20 are respectfully requested.

Fuh, alone or in combination with a conventional browser

Teaches Away Applicants’ Claimed Invention

Fuh teaches that “the HTTP packets are intercepted by a firewall... and can prevent users of clients... from accessing undesirable web sites” (Col. 7, lines 41-45). Also, Fuh teaches a browser 304 running at a client 306 as separate and distinct from the firewall router 210 (FIG. 3). Thus, according to teaching of Fuh, the intercepting of HTTP packets to prevent users of clients from accessing undesirable web sites is accomplished at the firewall router, and teaches away from performing the monitoring activity at a client device as claimed by Applicants. Even when Fuh is combined with a conventional browser as proposed by Examiner’s Official Notice, the combination still teaches away from Applicants’ claimed invention because the Fuh would still be intercepting HTTP

packets at the firewall router, and would still not be monitoring session activity neither at the client nor at the firewall router.

Fuh teaches that “if Client 306 does not initiate any network traffic through the firewall router 210...Authentication Proxy 400 will prompt User 302 to renew authentication for a new HTTP connection” (Col. 14, lines 50-56). Thus, the firewall router determines the content that is presented for the authentication request (i.e., a prompt to the User to renew the authentication), and the Client does not have the option of presenting a user specified predetermined page web. The teaching of Fuh, alone or even if combined with a conventional browser as proposed by Examiner, teaches away from Applicants’ claimed invention because the combination would not provide for “displaying a second predetermined web page at the client device” with “the ultimate result of maintaining privacy for the user is achieved in that once a timeout condition is reached, the content displayed at the browser is a page that is pre-defined by the user” (present application paragraph [0034]), but instead would present a fixed prompt to the user to renew the authentication. Fuh, alone or if combined with a conventional browser does not allow a user to predetermine a web page based on a request for authentication. Thus, Fuh, alone or if combined with a conventional browser teaches away from Applicants’ claimed invention.

There is no suggestion or motivation to combine Fuh with a conventional browser.

Fuh teaches “a browser 304 is executed by Client 306” (Col. 9, lines 7-8). Also Fuh teaches a browser 304 running at a client 306 as separate and distinct from the firewall router 210 (FIG. 3). Fuh requires the browser to be running on the client device, and not on the firewall router. Since Fuh requires the browser to be running on the client device, and not on firewall router, then there is no motivation to combine Fuh with a conventional browser as proposed by Examiner’s official Notice to produce Applicants’ claimed invention.

There is no reasonable expectation of success in the proposed combination

The proposed combination of Fuh with a conventional browser as proposed by Examiner's Official Notice still fails to produce or suggest Applicants' claimed invention. Running a browser within a firewall router does not enable "monitoring the more than one browser sessions" since the firewall router is not managing displayed web content monitoring browser sessions but is instead intercepting HTTP packets (Col. 7, lines 41-45); Fuh is not "responsive to a timeout condition at any one of the browser sessions" since the firewall router "inactivity timer expires when no communications are directed from the client to the network resource through the network device" (Col. 5, lines 10-20); the firewall router is not monitoring browser sessions; and Fuh does not display the second user predetermined web page at each of the browser sessions having a time out condition. Thus, even with the proposed combination, there is no reasonable expectation of success in producing Applicants' claimed invention.

Therefore, it is respectfully submitted that the Examiner has failed to establish a *prima facie* case of obviousness under 35 USC 103(a) with respect to claim 5 and corresponding claims 14 and 20. Withdrawal of the rejection and allowance of claims 5, 14 and 20 are respectfully requested.

With respect to Examiner's rejection of claims 4 and 13, Applicants respectfully submit that since Fuh does not anticipate method claim 1 and corresponding system claim 10, then the rejection of dependent claims 4 and 13 which depend from corresponding claims 1 and 10 should be withdrawn, and claims 4 and 13 should be allowed.

With respect to Examiner's rejection of claims 7, 16, and 22, Applicants respectfully submit that since Fuh does not anticipate method claim 1 and corresponding AUS9-2001-1022US1

system claim 10, and computer program product 18, then the rejection of dependent claims 7, 16 and 22 which depend from corresponding claims 1, 10, and 18, should be withdrawn, and claims 7, 16, and 22 should be allowed.

Conclusion

It is respectfully submitted that the claims of the present application are patentable over the cited art under 35 USC for at least the reasons set forth above. The patents cited by the Examiner have been reviewed and the present invention is believed to be patentable thereover. In view of the foregoing, withdrawal of the outstanding rejections and the generation of a Notice of Allowance for the current pending claims is earnestly solicited. The Examiner is invited to telephone the undersigned attorney if such a discussion could lead to the resolution of any outstanding issues.

Respectfully submitted,



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